

AMENDMENT UNDER 37 C.F.R. § 1.111
U.S. APPLN. NO. 10/816,887

ATTORNEY DOCKET NO.: Q79993

AMENDMENTS TO THE DRAWINGS

Applicant submits herewith five (5) replacement drawing sheets containing Figs. 1, 2a, 2b, 2c and 2d.

Attachment: Replacement Sheets - Figs. 1, 2a, 2b, 2c and 2d

REMARKS

Claims 1-26 of the present application have been examined. Claims 1-8 have been rejected under 35 U.S.C. § 101, and claims 1-26 have been rejected on prior art grounds. By this Amendment, Applicant has canceled claims 2, 7, 11-12 and 20-21 without prejudice or disclaimer. Thus, upon entry of the present Amendment, claims 1, 3-6, 8-10, 13-19 and 22-26 will be all the claims pending in the application.

I. Formal Matters

Applicant thanks the Examiner for acknowledging the foreign priority claim and receipt of the priority document. However, the Examiner has not initialed and returned the PTO SB/08 Forms submitted with the Information Disclosure Statements of September 13, 2006, August 10, 2005, May 16, 2005, September 10, 2004 and August 12, 2004, indicating that the documents cited therein have been considered. Applicant therefore respectfully requests that the Examiner initial and return the PTO SB/08 Forms in the next PTO communication.

II. Drawing Objection

The Examiner has objected to the drawings filed on April 5, 2004. Specifically, the Examiner maintains that Figures 1 and 2a-2d should be designated by a legend such as Prior Art. Applicant is submitting herewith five sheets of replacement drawings incorporating the amendment suggested by the Examiner. Thus, Applicant respectfully requests the Examiner to withdraw the drawing objection.

III. Claim Rejection under 35 U.S.C. § 101

Claims 1-8 have been rejected 35 U.S.C. § 101 as allegedly directed to non-statutory subject matter. Specifically, the Examiner maintains that claims 1-8 are directed to “A network connection apparatus” made up of modules, but that the apparatus lacks the necessary physical articles or objects to constitute a machine or manufacture within the meaning of 35 U.S.C. § 101. Applicant has amended claims 1, 3 and 4 in a manner believed to overcome the rejection. Since claims 2 and 7 have been canceled without prejudice or disclaimer, Applicant submits that the rejection of such claims is now moot.

IV. Claim Rejection under 35 U.S.C. § 103(a) over U.S. Patent Appln. Publ.

2003/0051009 to Shah et al. (“Shah”) in view of U.S. Patent No. 5,075,884 to Sherman et al. (“Sherman”)

Claims 1-5, 7-16 and 18-25 have been rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over Shah in view of Sherman. Applicant respectfully traverses the rejection.

A. Claim 1

Claim 1 recites,

A network connection apparatus, comprising:
a computer-readable medium storing a computer program,
which when executed by a computer processor, comprises a join
module for connecting a second network, to which the join module
belongs, with a first network in response to an inter-network
connection request message transmitted from the first network,
setting a security level of the first network to a set security level,
and controlling network command messages in response to the set
security level;

a connection module for receiving the inter-network connection request message transmitted from the first network and connecting the first network with the second network;

an authentication/security module for determining whether to allow a connection of the first network that has transmitted the inter-network connection request message to the connection module, and setting and checking the security level of the first network; and

a transmission module for transmitting a requested network command message requested by the first network when the connection is allowed by the authentication/security module;

wherein the security level is applied differently depending on the first network to be connected.

In the network connection apparatus of claim 1, the authentication/security module determines whether the connection for the first network that transmitted the network-connection message between networks is to be allowed and sets and checks the security level for the network. Also, the security level is applied differently according to the first network that transmitted the connection-request message between networks. That is, if the first network that transmitted the connection-request message between networks is connected in the state where each level has been set in the device existing in its own network, the device to be connected to the first network and the device not to be connected to the first network are determined based on the set level. Hence, in the case of important devices, by setting the level high, when connected to the first network, only devices set low can be shown.

On the other hand, Sherman is directed to a multi-level security workstation. Referring to FIG. 2 of Sherman, the workstation has a separate internal configuration such as a TCB, a port and a processor, and the security level information is stored in the TCB, the port and the processor. Hence, the configuration taught by Sherman is different from that of the apparatus

described in claim 1. Further, Sherman fails to teach or suggest the claimed features of setting the security level for the first network, and applying a different security level according to the network that transmits the connection-request message between networks. Specifically the Examiner cites col. 4, lines 33-41 and 60-61 of Sherman as teaching the claim feature of “setting a security level of the first network to a set security level, and controlling network command messages in response to the set security level.” Sherman merely teaches that a “secure LAN 26 enables communication between nodes...of equivalent security levels in isolation from TCBs at other security levels thus preventing communication between TCBs of nonequivalent security levels.” *See* Sherman at col. 4, lines 36-41. Sherman also teaches that each port of a workstation has a defined security level which is specified by the TCB. *See* Sherman at col. 4, lines 60-63. In other words, Sherman merely teaches that ports of a workstation contain a security level and that communication between ports is restricted according to the security levels. However, Sherman does not teach or suggest “setting a security level.”

Since Shah fails to cure the deficient teachings of Sherman with respect to claim 1, Applicant submits that claim 1 is patentable over the cited references for at least the foregoing reasons.

B. Claims 2-5, 7 and 8

Since claims 2 and 7 have been canceled without prejudice or disclaimer, Applicant submits that the rejection of such claims is now moot. Since claims 3-5 and 8 are dependent

upon claim 1, Applicant submits that such claims are patentable over Shah and Sherman at least by virtue of their dependency.

C. Claims 9-16

Since claim 9 recites features similar to those discussed above in conjunction with claim 1, Applicant submits that claim 9 is patentable over Shah and Sherman for at least similar reasons. Since claims 11-12 have been canceled without prejudice or disclaimer, Applicant submits that the rejection of such claims is now moot. Since claims 10 and 13-16 are dependent upon claim 9, Applicant submits that such claims are patentable over Shah and Sherman at least by virtue of their dependency.

D. Claims 18-25

Since claim 18 recites features similar to those discussed above in conjunction with claim 1, Applicant submits that claim 18 is patentable over Shah and Sherman for at least similar reasons. Since claims 20-21 have been canceled without prejudice or disclaimer, Applicant submits that the rejection of such claims is now moot. Since claims 19 and 22-25 are dependent upon claim 18, Applicant submits that such claims are patentable over Shah and Sherman at least by virtue of their dependency.

V. Claim Rejection under 35 U.S.C. § 103(a) over Shah in view of Sherman, in further view of U.S. Patent No. 6,725,281 to Zintel et al. ("Zintel")

Claims 6, 17 and 26 have been rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over Shah in view of Sherman, in further view of Zintel.

Since claims 6, 17 and 26 are dependent upon claims 1, 9 and 18, respectively, and Zintel fails to cure the deficient teachings of Shah and Sherman with regard to claims 1, 9 and 18, Applicant submits that claims 6, 17 and 26 are patentable over the cited references at least by virtue of their respective dependencies.

VI. Conclusion

In view of the above, reconsideration and allowance of this application are now believed to be in order, and such actions are hereby solicited. If any points remain in issue which the Examiner feels may be best resolved through a personal or telephone interview, the Examiner is kindly requested to contact the undersigned at the telephone number listed below.

The USPTO is directed and authorized to charge all required fees, except for the Issue Fee and the Publication Fee, to Deposit Account No. 19-4880. Please also credit any overpayments to said Deposit Account.

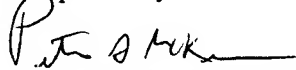
SUGHRUE MION, PLLC
Telephone: (202) 293-7060
Facsimile: (202) 293-7860

WASHINGTON OFFICE

23373

CUSTOMER NUMBER

Respectfully submitted,



Peter A. McKenna
Registration No. 38,551

Date: April 7, 2008